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A Limited Liability Company**

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“Protecting the Rights of People Since 1992”

June 21, 2019

The Honorable Michael B. Kaplan, U.S.B.J.
402 East State Street
Courtroom #8
Trenton, NJ 08608

**In Re: Rodney Kelly
Case No: 19-11490**

Dear Judge Kaplan:

Please accept this letter in lieu of a more formal memorandum in opposition to creditors response to Motion to Expunge WFB's Proof of Claim.

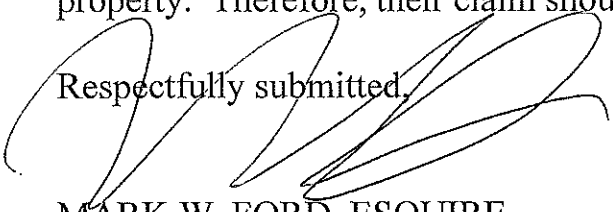
The creditor failed to file a valid lien on debtor's property.

The creditor filed a copy of Schedule C, legal description. Page 11 Document 63.2 of the alleged secured lien on the property.

It describes the following recital which states: being known and designated as Lot 42 and Block 140 as shown on a certain map entitled “ Final Platt North Arlington Heights, situated in the Boro of North Arlington Bergen City, New Jersey, and filed in Bergen County Clerk's Office on December 9, 1961, number 5626.

Please note that the property is located in Burlington County and not in Bergen County and creditors failed to file a valid lien on the debtor's property. Therefore, their claim should be an unsecured claim.

Respectfully submitted,



MARK W. FORD, ESQUIRE

MWF:rp